

**From:** [Jonathan Street](#)  
**To:** [Leslie Goff Sanders](#); [Lauren Irwin](#)  
**Cc:** [Daniel Crowell](#); [Stephen C. Stovall](#)  
**Subject:** Re: Lampo Document Production -- Best Place to Work  
**Date:** Thursday, March 30, 2023 5:24:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Leslie-

Defendant Ramsey's statement clearly does not reflect what the court ordered him to state. Please let us know if he plans on complying. His response leaves open the potential responsive documents exist but they are in the possession of Defendant Lampo, not Defendant Ramsey. This was precisely the response the court stated would be inappropriate.

You also stated:

*Anyone interviewed once the litigation **was initiated was by me, not Lampo.** We've identified everyone we know with knowledge.*

Who were the witnesses you interviewed? You were ordered to disclose. The court specifically stated the identities were not protected by privilege.

We are not required to try and work this out with you before filing however we are doing so in good faith.

I'm not going to get into a long drawn out discussion. Either you can commit to comply with the order or not.

Jonathan A. Street  
Managing Partner  
The Employment and Consumer Group  
1720 West End Ave, Suite 402  
Nashville, TN 37203  
(615) 850-0632

---

**From:** Leslie Goff Sanders <[lsanders@bartonesq.com](mailto:lsanders@bartonesq.com)>  
**Sent:** Thursday, March 30, 2023 5:13:27 PM  
**To:** Jonathan Street <[street@eclaw.com](mailto:street@eclaw.com)>; Lauren Irwin <[lauren@eclaw.com](mailto:lauren@eclaw.com)>  
**Cc:** Daniel Crowell <[dcrowell@bartonesq.com](mailto:dcrowell@bartonesq.com)>; Stephen C. Stovall <[sstovall@bartonesq.com](mailto:ssstovall@bartonesq.com)>  
**Subject:** RE: Lampo Document Production -- Best Place to Work

Jon – I have reviewed the Court's Order dated January 24, 2023, the Declaration of David L. Ramsey served on February 15, 2023 and Lauren's email dated March 22, 2023. The first sentence of Mr. Ramsey's declaration says he has no documents in his personal possession, custody or control. I do not understand your concern. With respect to witnesses, what are you asking for that we have not already provided?

**Leslie Goff Sanders**

Nashville Managing Partner  
Barton LLP  
611 Commerce Street, Suite 2603  
Nashville, TN 37203  
Tel: 615-340-6790 | Direct Dial: 615-340-6793  
[lsanders@bartonesq.com](mailto:lsanders@bartonesq.com) | [www.bartonesq.com](http://www.bartonesq.com) | [bio](#) | [vcard](#)

**BARTON**  
Discover Better Law



---

**From:** Jonathan Street <[street@eclaw.com](mailto:street@eclaw.com)>

**Sent:** Thursday, March 30, 2023 2:58 PM

**To:** Leslie Goff Sanders <[lsanders@bartonesq.com](mailto:lsanders@bartonesq.com)>; Lauren Irwin <[lauren@eclaw.com](mailto:lauren@eclaw.com)>

**Cc:** Daniel Crowell <[dcrowell@bartonesq.com](mailto:dcrowell@bartonesq.com)>; Stephen C. Stovall <[sstovall@bartonesq.com](mailto:ssstovall@bartonesq.com)>

**Subject:** Re: Lampo Document Production -- Best Place to Work

Leslie-

I am not taking depositions the day after you dump this on us. I will send some potential dates tomorrow

On another note-

We need Mr. Ramsey to send us a sworn declaration stating what he was ordered to state by the court.

Also, we need the names of all witnesses identified whether it was Lampo or yourself.

Please let me know if you plan on doing so by the end of the day or we will plan on filing our Rule 37 motion.

Jon

Jonathan A. Street  
Managing Partner  
The Employment and Consumer Group  
1720 West End Ave, Suite 402  
Nashville, TN 37203  
(615) 850-0632

**From:** Leslie Goff Sanders <[lsanders@bartonesq.com](mailto:lsanders@bartonesq.com)>  
**Sent:** Thursday, March 30, 2023 2:52:07 PM  
**To:** Jonathan Street <[street@eclaw.com](mailto:street@eclaw.com)>; Lauren Irwin <[lauren@eclaw.com](mailto:lauren@eclaw.com)>  
**Cc:** Daniel Crowell <[dcrowell@bartonesq.com](mailto:dcrowell@bartonesq.com)>; Stephen C. Stovall <[sstovall@bartonesq.com](mailto:sstovall@bartonesq.com)>  
**Subject:** Lampo Document Production -- Best Place to Work

Please find below a link to the final batch of documents related to Best Place to Work designation. This is the result of the search of ~3300 Outlook accounts. Documents that were sent companywide were deduped to avoid needless repetition because of the volume of accounts. Now that you have all of the documents, please confirm whether you will take the depositions tomorrow as we are still holding it on our calendar. Thanks.

<https://trustpointone.sharefile.com/d-s77aa588ae34d4bdcbccb7305b2801005>

Password: @bVRF4bm5&\$heQ9

**Leslie Goff Sanders**

Nashville Managing Partner  
Barton LLP  
611 Commerce Street, Suite 2603  
Nashville, TN 37203  
Tel: [615-340-6790](tel:615-340-6790) | Direct Dial: [615-340-6793](tel:615-340-6793)  
[lsanders@bartonesq.com](mailto:lsanders@bartonesq.com) | [www.bartonesq.com](http://www.bartonesq.com) | [bio](#) | [vcard](#)

**BARTON**  
Discover Better Law



**This email was originated outside of Barton LLP.**

**Barton LLP puts security of the firm at a high priority. Therefore, we have put efforts into ensuring that this message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, we ask that you vigilantly check emails for correct email addresses, and to check with IT if you are unsure about an attachment. The recipient of this email is responsible for reviewing its content and sender to protect Barton LLP from any possible security threat.**

**This email was originated outside of Barton LLP.**

**Barton LLP puts security of the firm at a high priority. Therefore, we have put efforts into ensuring that this message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted, or corrupted. Therefore, we ask that you vigilantly check emails for correct email addresses, and to check with IT if you are unsure about an attachment. The recipient of this email is responsible for reviewing its content and sender to protect Barton LLP from any possible security threat.**